



Wichita Plant



July 28, 2014

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U.S. Environmental Protection Agency Region 7  
Attn: Chief, RCRA Corrective Action and Permits Branch  
Air, RCRA and Toxics Division  
11201 Renner Boulevard  
Lenexa, Kansas 66219

**RE: 2nd QUARTER 2014 QUARTERLY PROGRESS REPORT; OCCIDENTAL  
CHEMICALS CORPORATION, WICHITA PLANT; USEPA ID# KSD007482029**

Dear Sir:

Enclosed please find the Quarterly Progress Report, as required by Occidental Chemical Corporation's RCRA hazardous waste permit number KSD007482029. This report summarizes the activities conducted for Part II of the Facility's RCRA Permit during the second quarter of 2014. In addition, please find enclosed the most recent version of the RFI Schedule, which is dated July 10, 2014 along with the most recent Vapor Intrusion ICM Monitoring Report for the second quarter of 2014, for your review and use. If you have any questions, please call Lisa R. Thurman at 316/529-7204.

Sincerely,

Steve Hieger  
Plant Manager

Enclosure

c.c.: Mostafa Kamal; KDHE  
Brad Roberts, USEPA Region VII  
Juan Somoano; GSHI  
Lisa Thurman; OCC  
Bruce Clegg; CRA

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**Occidental Chemical Corporation**



**Occidental Chemical Corporation, Quarterly Progress Report  
April 1, 2014 through June 30, 2014**

Pursuant to Occidental Chemical Corporation's (OCC) hazardous waste permit KSD007482029, Part II, Section C.13, OCC is submitting this quarterly progress report. This report updates the progress of RCRA Corrective Action activities conducted during the second quarter of 2014.

- Completed the first 2014 semi-annual groundwater monitoring event.
- A quarterly building monitoring and inspection event was completed. The completed reporting form was submitted to EPA and is attached hereto.
- Submitted to EPA a permit modification request which revised the SWMU/AOC list and included a newly identified SWMU.
- Submitted a response to EPA comments letter on the Phase II On-Site Groundwater Investigation RFI Summary Report and submitted a Phase II On-Site Groundwater RFI Supplemental Report.
- Continued construction of a wastewater treatment plant (third carbon absorption system) for interceptor wells (IW40, IW44, IW45 and IW46).
- Continued operation of the interceptor well network for groundwater control around Occidental's Wichita plant.
- Continued with the implementation of modifications to the groundwater extraction and treatment system.
- Completed quarterly regional hydraulic monitoring.
- Continued drafting a Human Health and Risk Assessment Work Plan.
- As reported to NRC, LEPC, KEM, WSCDCH, and EPA, the Wichita facility had a Reportable Quantity release of chlorine on May 9<sup>th</sup>, 2014. A fibercast reducer failed at the M-1 Cellroom releasing 24.9 lbs of chlorine to the atmosphere. Notification was made immediately to the agencies, followed up by a Form A and letter describing the incident in detail.

Work scheduled for the third quarter of 2014 includes:

- Submit the Semi-Annual Groundwater Monitoring Report (Spring 2014).
- Complete the installation of new monitoring wells as recommended in the Phase II On-Site Groundwater Investigation RFI Summary Report.
- Continue operation of the interceptor well network for groundwater control around Occidental's Wichita plant.
- Continue with the implementation of modifications to the groundwater extraction and treatment system, including construction of the wastewater treatment plant and extraction well conveyance system for interceptor wells IW40, IW44, IW45 and IW46.
- Conduct and report a quarterly building inspection and pressure monitoring event.
- Submit a Human Health and Risk Assessment Work Plan.

Notifications:

- On June 20, 2014, a Notification of Plant Changes was submitted to EPA. The changes include filling in Sump 426 with concrete to enable the installation of a 30,000-gallon air receiver. The work is currently planned for the end of July.



CORRECTIVE ACTION CHRONOLOGY	
DATE	EVENT
07/07/2008	Draft Work Plan for Indoor Soil Gas Sampling
07/07/2008	Comments to QAPP Addendum 04/18/08
07/07/2008	Spring 2008 Neighbor Results
07/11/2008	Request for Interim Measures for Railroad Tracked Areas
07/25/2008	Revised Asbestos Surface Impoundment SWMU Interim Corrective Measure Implementation Report
07/28/2008	2008 2nd Quarter Progress Report
08/05/2008	Comments to Draft Work Plan for Collection & Analysis of Groundwater Samples (Appendix 9)
08/08/2008	Notice of Plug & Abandonment of DW #4
08/08/2008	Request for Extension of QAPP Comment Response
08/15/2008	Response to Railroad Tracked Areas Interim Measures Letter
08/18/2008	Interim Corrective Measures Implementation Report for Asbestos Surface Impoundment SWMU
09/03/2008	Draft Work Plan for Collection & Analysis of Groundwater Samples (Appendix 9)
09/19/2008	Revised Draft Work Plan for Indoor Soil Gas Sampling
09/22/2008	Comments to Draft Work Plan for Indoor Soils Gas Sampling
09/30/2008	Approval Letter for Work Plan for Indoor Soils Gas Sampling
10/03/2008	Comments to Draft Work Plan for Collection & Analysis of Groundwater Samples (Appendix 9)
10/30/2008	Appendix IX Semi-Annual Groundwater Monitoring Report
11/03/2008	Draft Work Plan for Collection & Analysis of Groundwater Samples
11/21/2008	Off-Site Soils Gas Sampling Data Evaluation Report
11/21/2008	Off-Site Geoprobe Groundwater Investigation Report
01/05/2009	Draft QAPP
01/19/2009	Indoor Soils Gas Sampling Report
01/23/2009	Sub-Slab Soils Gas Sampling
01/28/2009	Semi-Annual Neighbor Well Data
01/28/2009	4 <sup>th</sup> Quarter Corrective Action Report
02/10/2009	Direct Push Investigation Comments to EPA
02/12/2009	Off-Site Geoprobe Groundwater Investigation Report
02/20/2009	Soil Gas Sampling Data Evaluation Comments to EPA
03/19/2009	Soils Gas Sampling Data Evaluation
03/26/2009	2009 Ongoing Activities Cost Estimate



DATE	CORRECTIVE ACTION CHRONOLOGY EVENT
04/20/2009	Off-Site Geoprobe Report
04/21/2009	Email responding to QAPP Comments
04/30/2009	Semi-Annual Groundwater Report
04/30/2009	Monitor Well Inspection Summary Report
05/08/2009	Response to Comments for Sub-Slab Soils Gas Sampling Report
06/08/2009	Final QAPP and SAP Reports
06/30/2009	RFI Investigation Work Plan for Landfill, Hex Pits, and Brine Ponds
06/30/2009	ICM Effectiveness Evaluation Report
08/26/2009	Revised RFI Work Plan for Alpha Cake Landfill, Hex Waste Pits and Brine Ponds
09/14/2009	Response to EPA's Comments letter dated July 9, 2009 regarding on-Site vapor intrusion
09/14/2009	On-Site Vapor Intrusion Investigation, Assessment and Interim Corrective Measures Implementation Report
11/30/2009	Draft Penta Area and Shipping RFI Work Plan
12/14/2009	Response to EPA Comments & Submission of Revised Interceptor Well ICM Effectiveness Evaluation Report
12/22/2009	Supplemental Off-Site Soil Gas Sample Collection and Analysis, 1 <sup>st</sup> Quarterly, letter submission
12/30/2009	Preliminary Draft Phase I Summary/Phase II Recommendations letter report
01/15/2010	Response to EPA Comments – On-Site VI, Assessment & Interim ICM Implementation Report
02/12/2010	Final Revision to Interceptor Well ICM Effectiveness Report
02/12/2010	Second 2009 Semiannual Groundwater Monitoring Report
02/16/2010	Received comments from EPA for Penta Area and Shipping RFI Work Plan
02/19/2010	Phase I Summary/Phase II Recommendations Letter Report (final), Alpha Cake Landfill, Hex Waste Pits and Brine Ponds RFI Work Plan
04/30/2010	Response to EPA Comments – Penta Area and Shipping RFI Work Plan
04/30/2010	Revised Penta Area and Shipping RFI Work Plan
05/17/2010	Resampling of MW137S1 Letter to EPA
05/28/2010	Inorganics Area RFI Work Plan
07/09/2010	Received comments from EPA for Inorganics Area RFI Work Plan
08/11/2010	Response to EPA Comments – Inorganics Area RFI Work Plan
08/11/2010	Revised Inorganics Area RFI Work Plan
08/24/2010	First Semiannual Groundwater Monitoring Report
09/23/2010	Groundwater Screening (near MW-140) Investigation Summary Letter

CORRECTIVE ACTION CHRONOLOGY	
DATE	EVENT
10/4/2010	Operation and Maintenance Plan for On-Site Vapor Intrusion ICM for on-Site buildings
10/15/2010	RFI Summary Report for the Alpha Cake Landfill, Hex Waste Pits and Brine Ponds
10/29/2010	Supplemental Quarterly Off-Site Soil Gas Monitoring Summary Report
12/20/2010	Response to EPA Comments on the Operation and Maintenance Plan for On-Site Vapor Intrusion ICM for on-Site buildings
12/16/2010	Received comments from EPA for Supplemental Quarterly Off-Site Soil Gas Monitoring Summary Report
12/16/2010	Received comments from EPA for RFI Summary Report, Alpha Cake Landfill, Hex Waste Pits and Brine Ponds
12/30/2010	Comprehensive Well Survey letter submittal to EPA
1/4/2011	Penta Area and Shipping RFI Summary Report
1/17/2011	Response to EPA comments and revised Supplemental Quarterly Off-Site Soil Gas Monitoring Summary Report
1/18/2011	Response to EPA comments and revised RFI Summary Report – Landfill Areas
2/16/2011	Inorganic Area RFI Summary Report
2/23/2011	Second 2010 Semiannual Groundwater Monitoring Report
3/2/2011	Draft Conceptual Design Summary for Groundwater ICM Modifications
4/18/2011	Chloromethanes I, II, Perc and Hazwaste Areas RFI Work Plan
4/18/2011	Arkema Area Investigative Work Plan
4/29/2011	Response to EPA comments and revised RFI Summary Report – Penta Area and Shipping
4/29/2011	Response to EPA comments and revised RFI Summary Report – Inorganics Area
5/2/2011	On-Site Vapor Intrusion Mitigation ICM Construction Completion Report
6/17/2011	Response to EPA comments and revised Preliminary Conceptual Design Groundwater ICM Modifications Rpt
6/30/2011	On-Site Groundwater RFI Work Plan
6/30/2011	Vapor Intrusion ICM Inspection and Pressure Monitoring Record Report Form
7/20/2011	Response to EPA comments and revised Arkema Area Investigative Work Plan
8/1/2011	Response to EPA comments and revised On-Site Vapor Intrusion Mitigation ICM Construction Completion Rpt
8/18/2011	First 2011 Semiannual Groundwater Monitoring Report
8/22/2011	Response to EPA comments and revised Penta Area and Shipping RFI Summary Report
8/22/2011	Response to EPA comments and revised Chloromethanes I, II, Perc and Hazwaste Areas RFI Work Plan
8/26/2011	Response to EPA comments and revised Conceptual Design Groundwater ICM Modifications Report
9/12/2011	Response to EPA comments and revised Groundwater Monitoring Program Summary Table
9/30/2011	Response to EPA comments and revised Arkema Investigative Work Plan



CORRECTIVE ACTION CHRONOLOGY	
DATE	EVENT
10/31/2011	Vapor Intrusion ICM Inspection and Pressure Monitoring Record Report Form
11/14/2011	Received EPA comments on On-Site Groundwater RFI Work Plan
11/14/2011	Received EPA approval letter for Arkema Area Investigative Work Plan
11/30/2011	Sampling and Analysis Plan
12/14/2011	Response to Comments and Revised On-Site Groundwater RFI Work Plan
1/5/2012	EPA Comments on Draft Sampling and Analysis Plan
1/27/2012	EPA Comments on On-Site Groundwater RFI Work Plan
2/8/2012	Response to Comments and Revised Sampling and Analysis Plan
2/20/2012	Second 2011 Semiannual Groundwater Monitoring Report
3/9/2012	Revised Sampling and Analysis Plan (SAP)
3/13/2012	Revised Standard Operating Procedures 4 for SAP
3/19/2012	Response to Comments and Revised On-Site Groundwater RFI Work Plan
3/21/2012	EPA Approval letter – On-Site Groundwater RFI Work Plan
4/17/2012	Stormwater Ponds Area RFI Work Plan
4/17/2012	Fuel Depot Area RFI Work Plan
8/6/2012	Penta Area and Shipping Phase II RFI Summary Report
8/6/2012	Chloromethanes I, II, Perc and Hazwaste Areas RFI and Arkema Area Investigation Summary Report
8/13/2012	Response to Comments and Revised Stormwater Ponds RFI Work Plan and Revised Fuel Depot RFI Work Plan
8/14/2012	Inorganics Area Supplemental Report
8/17/2012	Formal Notification of Additional SWMUs
8/24/2012	First 2012 Semiannual Groundwater Monitoring Report
11/14/2012	Class I Modification Letter for Additional SWMUs
11/15/2012	Phase I On-Site Groundwater Investigation RFI Summary Report
2/22/2013	Second 2012 Semiannual Groundwater Monitoring Report
3/7/2013	Response to EPA Comments and Revised Penta Area and Shipping Phase II RFI Summary Report
3/15/2013	Response to EPA Comments and Revised Phase I On-Site Groundwater RFI Summary Report
3/22/2013	Fuel Depot and Stormwater Ponds Area RFI Summary Report
4/19/2013	EPA approval letter – Revised Phase I On-Site Groundwater Summary Report and Revised Phase II Penta Area and Shipping RFI Summary Report
4/24/2013	Monitoring Well Abandonment and Replacement letter



4/25/2013	EPA approval letter – Fuel Depot and Stormwater Pond Area RFI Summary Report
8/22/2013	First 2013 Semiannual Groundwater Monitoring Report
2/25/2014	Second 2013 Semi-Annual Groundwater Monitoring Report
2/25/2014	Phase II On-Site Groundwater RFI Summary Report
3/11/2014	Formal Notification of an Additional Solid Waste Management Unit
5/16/2014	EPA Comments – Phase II On-Site Groundwater Investigation RFI Summary Report
6/6/2014	Class I Permit Modification Letter, Additional Solid Waste Management Unit
6/19/2014	Response to EPA Comments and Phase II On-Site Groundwater Investigation RFI Supplemental Report
6/20/2014	Notification of Plant Changes Letter

# Pressure Measurement Record

## Administration Building, Technical Center, Control Laboratory

Technician Name: Jeremy Raye

Date: 6/20/2014

### Equipment and Calibration

Pressure Meter Make, Model, and Identifier

**Omniguard 4**

Unusual weather conditions ☐ yes ☒ no

Units

☒ in WC

☐ \_\_\_\_\_

Zero Calibration

☒ Pass ☐ Fail

Pressure meter reads 0.000 when both ports are open to ambient air.

Pressure measurement requires a differential pressure meter (aka micromanometer) with a resolution of 0.01 inches of water (in WC) or less (0.001 preferred). The recorded pressure measurement will be the average of readings collected over a half-hour time span (to avoid ephemeral pressure changes such as wind gusts).

Administration Building	Time	Half-Hour Average Differential Pressure (in WC)	Minimum Effective +0.001 in WC	Notes
Second Floor	11:20	0.033	<del>Minimum Effective +0.001 in WC</del>	Good
Cafeteria	10:40	0.014	<input checked="" type="checkbox"/> Pass <input type="checkbox"/> Fail	Good
Basement	10:05	0.007	<input checked="" type="checkbox"/> Pass <input type="checkbox"/> Fail	Good

Note: Inlet 1 should be open to indoor air. Inlet 2 (Reference) should be connected to the outdoor air tubing.

Technical Center (R&D Lab)	Time	Half-Hour Average Differential Pressure (in WC)	Minimum Effective +0.001 in WC	Notes
North Basement	12:45	0.018	<input checked="" type="checkbox"/> Pass <input type="checkbox"/> Fail	Good
South Basement	12:00	0.027	<input checked="" type="checkbox"/> Pass <input type="checkbox"/> Fail	Good

Note: Inlet 1 should be open to indoor air. Inlet 2 (Reference) should be connected to the outdoor air tubing.

Control Laboratory	Time	Half-Hour Average Differential Pressure (in WC)	Minimum Effective +0.001 in WC	Notes
Lab Area	13:30	0.030	<input checked="" type="checkbox"/> Pass <input type="checkbox"/> Fail	Good

Note: This monitoring location is outside the building (unlike the Administration Building and Technical Center) and the tubing should be connected as follows: Inlet 1 should be connected to the indoor air tubing. Inlet 2 (Reference) should be open to outdoor air.

### Notes:

All measuring points passed.

Upon completion, this form should be sent to the OXY Wichita Environmental Department (Lisa Blair) or Conestoga-Rovers & Associates (Doug Soutter: dsoutter@craworld.com).





# Building Inspection Record

## Administration Building, Technical Center, Control Laboratory

Technician Name: **Jeremy Raye**

Date **6/20/2014**

### Administration Building

Building Inspection Notes  
(Building Envelope and Floors)

Second Floor	Good
Cafeteria	Good
Basement	Good

Additional details and corrective action

### Technical Center (R&D Lab)

Building Inspection Notes  
(Building Envelope and Floors)

North Basement	Good
South Basement	Good

Additional details and corrective action

### Control Laboratory

Building Inspection Notes  
(Building Envelope and Floors)

Lab Area	Good
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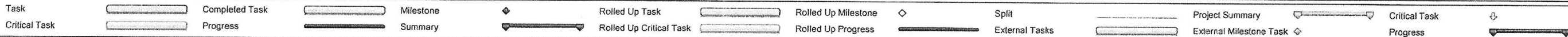
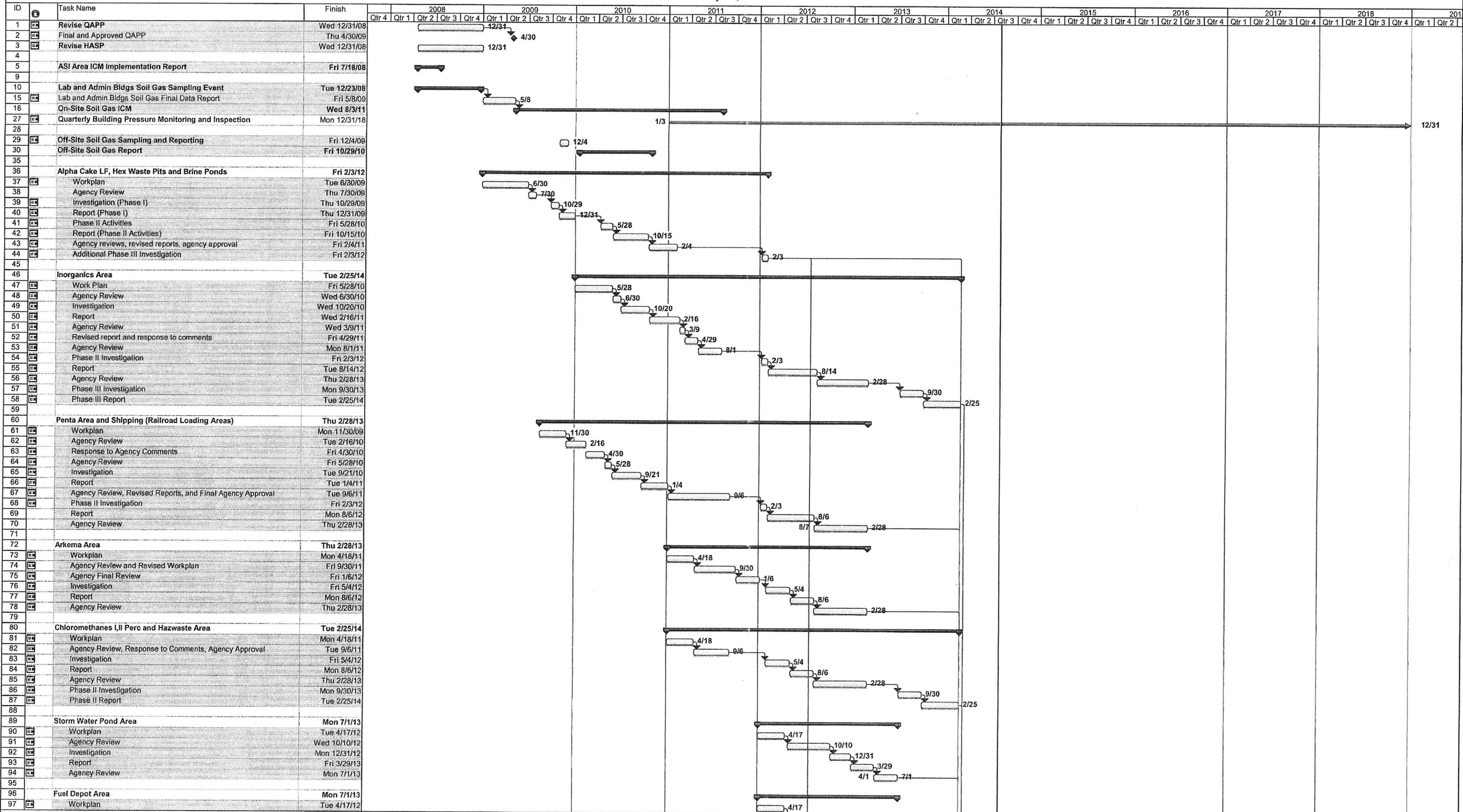
Additional details and corrective action

Upon completion, this form should be sent to the OXY Wichita Environmental Department (Lisa Blair) or Conestoga-Rovers & Associates (Doug Soutter: [dsoutter@craworld.com](mailto:dsoutter@craworld.com)).



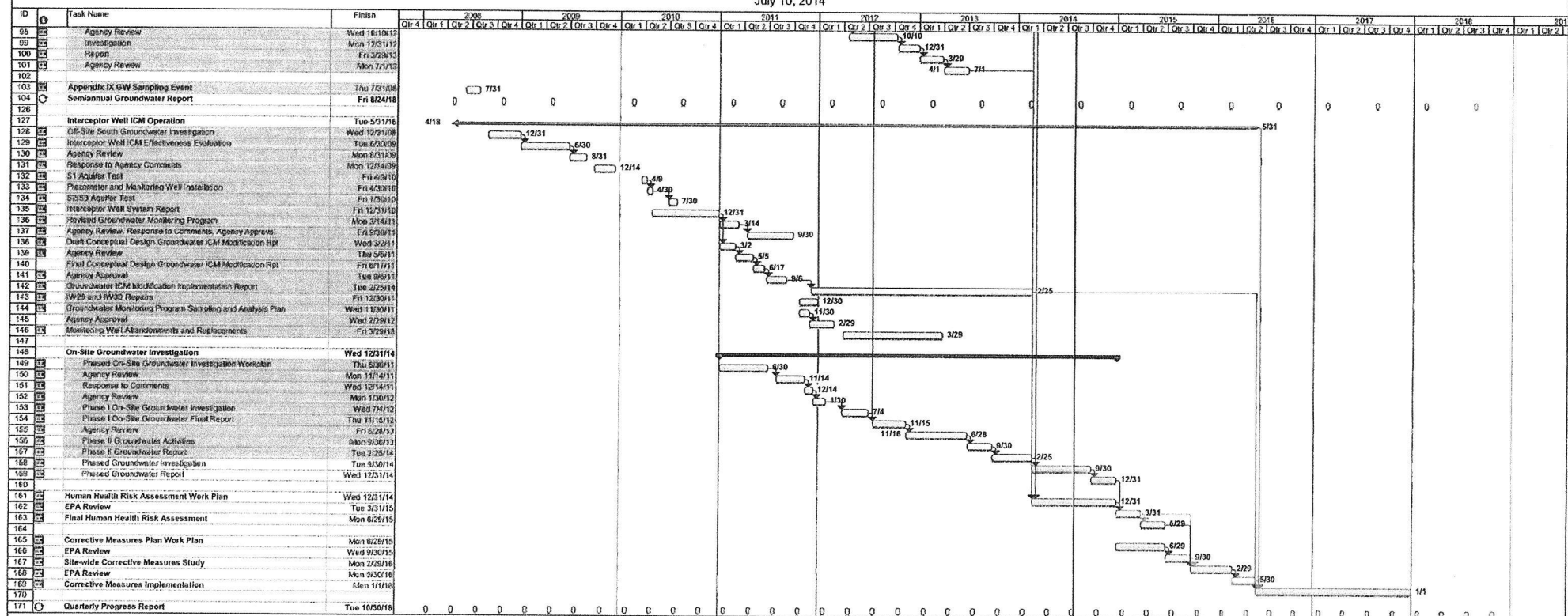
Occidental Chemical Corporation

Wichita Facility  
DRAFT RFI Schedule  
July 10, 2014





Wichita Facility  
DRAFT RFI Schedule  
July 10, 2014



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